

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARU DESAI,
Plaintiff,

v.

UMASS MEMORIAL MEDICAL GROUP,
INC., et al.,
Defendants.

CIVIL ACTION NO. 4:19-cv-10520-TSH

**PLAINTIFF'S MOTION *IN LIMINE*
TO EXCLUDE EXPERT
TESTIMONY OF
ELLA A. KAZEROONI, M.D.**

NOW COMES Plaintiff Charu Desai (also referred to as "Plaintiff" or "Dr. Desai"), by and through her attorneys, Kolman Law, P.C., and the Upper Charles Legal Group, and pursuant to Local Rule 7.1 move *in limine* to exclude the testimony of Ella A. Kazerooni, M.D.

Plaintiff relies on her attached Memorandum of Law in support of this Motion *in limine* and incorporates it fully herein as if set forth at length.

Respectfully submitted,
CHARU DESAI
By her attorneys,

/s/ Timothy D. Rodden Jr.
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And,

Timothy M. Kolman, Esq., Pro Hac Vice
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Dated: November 21, 2022

CERTIFICATION OF CONFERENCE

Pursuant to D. Mass. Local Rule 7.1(a)(2), prior to the filing of this Motion, on November 20, 2022, counsel for Plaintiff, Timothy M. Kolman and Timothy D. Rodden, Jr., conferred with counsel for Defendants, Robert L. Kilroy and Reid M. Wakefield, in a good faith attempt to resolve or narrow the issues raised herein, and no agreement could be reached.

/s/ Timothy D. Rodden Jr.

Timothy D. Rodden Jr.